

# Holland & Knight

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August 5, 2021

***VIA CM/ECF & VIA Overnight Mail***

Honorable Anne E. Thompson  
U.S.D.C. District of New Jersey  
Clarkson S. Fisher Bldg. & US Courthouse  
402 East State Street  
Trenton, NJ 08608

Re: Credit One Bank, N.A. v Lieberman, et al.  
U.S.D.C. D.NJ. Civil Action No. 3:21-CV-02923-AET-DEA

Dear Judge Thompson:

I write on behalf of Credit One Bank, N.A. (“Credit One”) to request amendment of the Order (Dkt. 10) entered on Credit One’s Petition to Confirm Arbitration Award in the above-referenced case.

On August 4, 2021, the Court granted Credit One’s Petition to Confirm Arbitration Award and denied Respondents’ Cross-Motion to Vacate the Arbitration Award. *See* Dkt. No. 9. The Opinion acknowledges that the Arbitrator awarded Credit One its attorneys’ fees, arbitral expenses, and costs in the amount of \$286,064.62 (*id.* at 3) and indicates that an appropriate order would follow (*id.* at 11). That same day, Your Honor entered an Order confirming the arbitration award and denying respondents’ cross-motion to vacate the award. *See* Dkt. No. 10.

In Credit One Bank’s Petition, in addition to seeking confirmation of the Corrected Final Award, Credit One requested that the Court enter an Order and Judgment in the amount of \$286,064.62 in favor of Credit One and against the Respondents, along with post-judgment interest. *See* Dkt. No. 1 at 1; *see* Dkt No. 2 at 6.

Credit One respectfully requests the Court’s August 4, 2021 Order (Dkt. No. 10) be amended to additionally reflect that judgment is entered in favor of Credit One and against the Respondents in the amount of \$286,064.62. A proposed amended Order is attached hereto. Credit One submits this request without waiver of its potential right to see a further amendment of the award to include counsel fees and costs associated with Defendants’ contest of Credit One’s Petition.

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Respectfully,

HOLLAND & KNIGHT LLP

A handwritten signature in blue ink, appearing to read "A. Soven", is written over the printed name.

Andrew J. Soven

AJS:seo

Enclosure

cc: Yitzchak Zelman, Esquire (w/ Encl.) (by ECF)  
Christopher Murphy, Esquire (w/o Encl.)

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW JERSEY

CREDIT ONE BANK, N.A.,	)	Civ. No. 21-2923
	)	<b>AMENDED ORDER</b>
<i>Petitioner,</i>	)	
v.	)	
	)	
ADAM LIEBERMAN AND GENESE	)	
LIEBERMAN,	)	
	)	
<i>Respondents.</i>	)	

THOMPSON, U.S.D.J.

The Court's Order dated August 4, 2021 (Dkt. 10) is hereby **AMENDED** to include the following additional language:

**IT IS HEREBY ORDERED** that judgment in the amount of \$286,064.62 is entered in favor of Credit One Bank, N.A. and against Adam Lieberman and Genese Lieberman, with post-judgment interest accruing at the statutory rate.

ANNE E. THOMPSON, U.S.D.J.